Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Telephone Number Portability	)))))	CC Docket No. 95-116

REPLY COMMENTS OF T-MOBILE USA, INC.

Thomas J. Sugrue, Vice President
Government Affairs
Anna Miller, Director
Numbering Policy
T-MOBILE USA, INC.
401 9th Street N.W. Suite 550
Washington, D.C. 20004

Todd D. Daubert
Jennifer M. Kashatus
KELLEY DRYE & WARREN LLP
1200 19th Street, N.W.
Washington, DC 20036
(202) 955-9600 (telephone)
(202) 955-9792 (facsimile)
tdaubert@kelleydrye.com

Counsel to T-Mobile USA, Inc.

December 17, 2004

SUMMARY

The Commission's focus in this proceeding must be on the consumer, and the Commission's goal should be to make intermodal porting as convenient and rapid as possible for consumers. The Commission has repeatedly found that intermodal portability serves the public interest by fostering intermodal competition, which benefits all consumers, including those who never choose to exercise their right to retain their number when switching between wireline and wireless carriers. However, intermodal portability fosters intermodal competition only when consumers can conveniently and rapidly switch between wireline and wireless carriers while retaining their numbers. In order to make intermodal porting as convenient and rapid as possible for consumers, the Commission should identify and eliminate, or at least minimize, any obstacle to reducing the interval between the time a consumer requests an intermodal port and completion of the requested port.

The comments in this proceeding demonstrate that unnecessary delays and inconveniences associated with the current intermodal porting process are frustrating consumers' efforts to retain their numbers while switching between wireline and wireless carriers. On average, it takes 8 to 10 calendar days from the time a consumer submits an intermodal port request until the requested port is completed, which contrasts starkly with the less than one day average to complete a wireless-to-wireless port request. The comments further demonstrate that approximately 25-30% of all customers cancel their intermodal port requests due to delays in the porting process. By contrast, the average cancellation rate for wireless intramodal ports is only 4.1%.

The evidence on the record shows that there are two main obstacles to reducing the interval between the time a consumer requests an intermodal port and completion of the

requested port. First, the lack of a uniform port request format and the practice of identifying only one error at a time in port requests frequently delays the processing of port requests for days and unnecessarily increases the burden that all carriers incur to process intermodal port requests. As numerous parties noted, the NANC C2/A3 recommendation does not address this obstacle at all, and thus implementation of the recommendation would not eliminate the unnecessary delays and burdens associated with achieving an error-free port request. Second, once the wireline carrier accepts the port request, up to four more business days can pass before the port request is completed under the intervals in the current intermodal porting procedure. The NANC C2/A3 recommendation is designed to shorten these intervals so that the maximum time permissible to process an error-free port request will be up to 25% shorter, which is a significant reduction.

T-Mobile agrees with Sprint, Nextel, CTIA and Syniverse that the NANC C2/A3 recommendation provides an appropriate starting point for reducing the maximum permissible time interval for processing error-free intermodal port requests. T-Mobile also agrees that the Commission should require all carriers to use a single, streamlined port request format that contains only the minimum amount of information necessary to validate and process the consumer's port request. There is widespread agreement among carriers from every industry sector that reducing the porting interval will not increase the number of inadvertent ports. Because implementation of the NANC C2/A3 recommendation and the modifications recommended by T-Mobile, Sprint, Nextel, CTIA and Syniverse would serve the public interest by making it easier for consumers to retain their number while switching between wireline and wireless carriers, T-Mobile respectfully requests that the Commission adopt them promptly.

The comments reflect widespread agreement that all carriers should be able to recover the legitimate costs of implementing the NANC C2/A3 recommendation and the modifications

recommended by T-Mobile, Sprint, Nextel, CTIA and Syniverse. T-Mobile agrees that the Commission should enter a blanket waiver of its five-year local number portability ("LNP") cost recovery rule so that ILECs have the opportunity to recover their legitimate LNP costs.

Because intermodal competition benefits all consumers, including those who never exercise their right to port, the benefits of the NANC C2/C3 recommendation and the modifications proposed by T-Mobile, Sprint, Nextel, CTIA and Syniverse will far outweigh the associated implementation costs. In most cases, the implementation costs will be very reasonable on a per subscriber basis. However, for those rare cases in which carriers would have to impose an unreasonably high per subscriber charge to recover the implementation costs, T-Mobile supports granting individual waivers – rather than a blanket exemption – of the Commission's rules requiring carriers to shorten the porting interval to carriers that meet the waiver standard on a case-by-case basis.

SUMMARY i
I. CONSUMERS WILL BENEFIT SIGNIFICANTLY FROM A SHORTER INTERMODAL PORTING INTERVAL AND AN IMPROVED INTERMODAL PORTING PROCESS 3
A. The Commission Should Consider Whether The Proposed Improvements Would Make Intermodal Porting Easier For Consumers When Making Its Public Interest Determination 5
B. The Commission Should Not Consider The Current Ratio Of Intermodal Ports To All Ports When Making Its Public Interest Determination 7
II. THE PROPOSED RECOMMENDATIONS WOULD SERVE THE PUBLIC INTEREST BY REDUCING THE DELAYS AND INCONVENIENCES ASSOCIATED WITH INTERMODAL PORTABILITY 9
A. The Commission Should Adopt a Single, Mandatory Port Request Format In Order To Facilitate Rapid Achievement of Error Free Port Requests 10
B. The Commission Should Adopt The NANC Recommendation For Reducing The Maximum Interval for Processing Error-Free Intermodal Port Requests 15
III. REDUCING THE INTERMODAL PORTING INTERVAL AND IMPROVING THE PORTING PROCESS WILL NOT CAUSE MORE INADVERTENT PORTS 18
IV. ILECS SHOULD BE PERMITTED TO RECOVER LEGITIMATE COSTS INCURRED TO SHORTEN THE INTERMODAL PORTING INTERVAL AND IMPROVE THE PORTING PROCESS 20
V. THE COMMISSION SHOULD GRANT WAIVERS OF ANY NEW REQUIREMENTS ON A CASE-BY-CASE BASIS AS APPROPRIATE 21
VI. CONCLUSION 24

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Telephone Number Portability	)))	CC Docket No. 95-116

REPLY COMMENTS OF T-MOBILE USA, INC.

T-Mobile USA, Inc. ("T-Mobile") submits these reply comments in the above-captioned proceeding. As T-Mobile explained in its initial comments, the Commission's focus in this proceeding must be on the consumer, and the Commission's goal should be to make intermodal porting as convenient and rapid as possible for consumers. The Commission has repeatedly found that intermodal portability serves the public interest by fostering intermodal competition, which benefits all consumers, including those who never choose to exercise their right to retain their number when switching between wireline and wireless carriers. Intermodal portability fosters intermodal competition only when consumers can conveniently and rapidly switch between wireline and wireless carriers while retaining their numbers. In order to make intermodal porting as convenient and rapid as possible for consumers, the Commission should identify and eliminate, or at least minimize, any obstacle to reducing the interval between the time a consumer requests an intermodal port and completion of the requested port. The Commission should seek to eliminate or minimize these obstacles in a manner that facilitates future improvements and creates incentives for carriers to process consumer port requests as efficiently as possible.

The initial comments of some parties erroneously suggest that the wireline porting process is the current default process for intermodal porting. The truth is that the Commission has never adopted, and the industry has never developed, a specific porting process for intermodal portability: when processing requests to port numbers out to other carriers, wireless carriers follow the wireless porting process and wireline carriers follow the wireline porting process. For years, the industry has attempted to reach consensus with respect to the proper process for validating and processing intermodal port requests, and yet no consensus has been, or likely soon will be, reached. Accordingly, it is important that the Commission now establish basic rules for all carriers to follow when processing intermodal port requests. In adopting these basic rules, the Commission should ensure that none of the flaws in current porting processes are carried forward into the new intermodal porting process.

Wireless carriers have implemented procedures for completing consumer port requests in a matter of hours rather than days. In developing these procedures, wireless carriers have addressed the root causes of delay and inconvenience in the current wireline porting process, which wireline carriers also apply to intermodal port requests. The success of the wireless porting process demonstrates that implementation of the NANC C2/A3 recommendation with the modifications T-Mobile, Sprint, Nextel, CTIA and Syniverse have proposed will result in an intermodal porting process that is as convenient and rapid as possible for consumers to foster intermodal competition.

Because intermodal competition benefits all consumers, including those who never exercise their right to port, the benefits of the NANC C2/A3 recommendation and the modifications proposed by T-Mobile, Sprint, Nextel, CTIA and Syniverse will far outweigh the associated implementation costs. T-Mobile supports the right of all carriers, including the

ILECs, to recover these costs. In most cases, the implementation costs will be very reasonable on a per subscriber basis. However, for those rare cases in which carriers would have to impose an unreasonably high per subscriber charge to recover the implementation costs, T-Mobile supports individual waivers granted by the Commission on a case-by-case basis.

I. CONSUMERS WILL BENEFIT SIGNIFICANTLY FROM A SHORTER INTERMODAL PORTING INTERVAL AND AN IMPROVED INTERMODAL PORTING PROCESS

T-Mobile agrees with CTIA, Nextel, Sprint, and Syniverse that consumers will benefit significantly from implementation of the NANC C2/A3 recommendation and the modifications T-Mobile, CTIA, Nextel, Sprint, and Syniverse have proposed to make the intermodal porting process more convenient and efficient for consumers.[1] The Commission based its decision to require the implementation of intermodal portability upon its conclusion that consumers will benefit significantly from intermodal portability.[2] Specifically, the Commission found that intermodal portability "will encourage CMRS-wireline competition, creating incentives for carriers to reduce prices for telecommunications services and to invest in innovative technologies, and enhancing flexibility for users of telecommunications services."[3] The Commission reiterated in the *Second Annual CMRS Competition Report* that wireline-wireless

---

1 CTIA Comments at 2, 5; Nextel Comments at 3, Sprint Comments at 4, 8; Syniverse Comments at 6.

2 Indeed, the Commission has "highlighted the critical policy goals underlying the LNP requirement, indicating that the ability of end users to retain their telephone numbers when changing service providers gives customers flexibility in the quality, price, and variety of telecommunications services they can choose to purchase." *Telephone Number Portability*, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 23697, 23699, ¶ 4 (2003) (quoting *Telephone Number Portability*, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 8352, 8368, ¶ 30 (1996) ("First Report and Order")). The Commission also has found that "number portability promotes competition between telecommunications service providers by, among other things, allowing customers to respond to price and service changes without changing their telephone numbers." First Report and Order, 11 FCC Rcd at 8368, ¶ 30.

3 First Report and Order, 11 FCC Rcd at 8437, ¶ 160.

portability would be instrumental in fostering its goal of achieving greater intermodal competition: "the ability to carry a telephone number from one service provider, whether they be wireline or wireless, to another provider is an important element in the transition of CMRS services from a complementary telecommunications service to a competitive equivalent to wireline services."[4] Indeed, since ordering CMRS-wireline portability, the Commission repeatedly has emphasized that wireless-wireline portability is in the public interest and that "the competitive reasons that led [the Commission] to mandate wireless number portability in the *First Report and Order* remain fundamentally valid: [the Commission] sought to increase competition both within the CMRS marketplace and with wireline carriers."[5]

Based on its findings that consumers would benefit from wireless portability due to increased intermodal competition, the Commission required carriers to spend millions of dollars in an attempt to realize the Commission's objective. There is no legal or factual basis for the Commission to depart from its conclusion that implementation of wireless portability was necessary to foster intermodal competition. To the contrary, making intermodal porting as convenient and rapid as possible for consumers is fundamental to realizing the Commission's goals of fostering intermodal competition.

Today, consumers who try to retain their numbers while switching between wireline and wireless carriers experience frustrating and unnecessary delays. Unless the Commission takes further steps to improve intermodal porting for consumers, then the potential benefits of the

---

4 *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services,* Second Report, 12 FCC Rcd 11266, 11326 (1997) ("*Second Annual CMRS Competition Report*").

5 *Cellular Telecommunications Industry Association's Petition for Forbearance from Commercial Mobile Radio Services Number Portability Obligations, and Telephone Number Portability,* Memorandum Opinion and Order, 14 FCC Rcd 3092, 3112, ¶ 40 (1999) ("*CTIA Petition for Forbearance*").

substantial investment that carriers have made to date will not be fully realized. Carriers' investments in portability will only achieve the Commission's desired policy goals, and thus serve the public interest, if it is easy and convenient for consumers to retain their number while switching between wireline and wireless carriers. Accordingly, the Commission has a duty under the Act to ensure the public interest is served by making it as easy as possible for consumers to take advantage of intermodal portability in light of the Commission's past decisions to require carriers to incur millions of dollars to implement wireless LNP based on the benefits to consumers from intermodal portability.

A. The Commission Should Consider Whether The Proposed Improvements Would Make Intermodal Porting Easier For Consumers When Making Its Public Interest Determination

The record evidence in this proceeding demonstrates both that there are significant flaws in the current intermodal porting process, and that these flaws are frustrating consumers' efforts to retain their numbers while switching between wireline and wireless carriers. On average, it takes 8 to 10 calendar days from the time a consumer submits an intermodal port request until the requested port is completed, which contrasts starkly with the less than one day average to complete a wireless-to-wireless port request. As T-Mobile explained in its initial comments, wireline carriers reject port requests an average of five to fifteen times before accepting the request as error free and processing the requested port.[6] Consequently, multiple days can pass before an ILEC even accepts and begins to process an intermodal port request, as Sprint and T-Mobile both have explained.[7]

---

[6] *See* T-Mobile Comments at 6.

[7] *See id.*; *see also* Sprint Comments at 6 (stating that there are substantial delays during the validation process and that it takes "an average of eight days for Sprint to complete approximately 80 percent of the successful port requests – longer for the remaining successful port requests.").

Despite BellSouth's unsupported claims to the contrary,[8] the current interval between the time a consumer requests an intermodal port and completion of the requested port interferes with the ability of consumers to retain their numbers while switching between wireline and wireless carriers, which inhibits intermodal competition by artificially suppressing demand for intermodal portability. As Sprint demonstrated in its comments, approximately 30% of customers cancel their intermodal port requests due to delays in the porting process.[9] In T-Mobile's experience, unnecessary delays and inconveniences in the intermodal porting process cause consumers on average to cancel approximately 25% of all intermodal port requests.[10] In other words, one out of every four consumers who wants to retain his or her number when switching from a wireline carrier to T-Mobile ultimately gives up entirely due to the delays and inconveniences associated with intermodal porting. By contrast, the average cancellation rate for wireless intramodal ports is only 4.1%.[11]

Consumers who submit an intermodal port request have explicitly and unambiguously expressed their wish both (1) to receive service from the wireless carrier of their choice and (2) to retain their number while switching from a wireline carrier to that wireless carrier. The abnormally high cancellation rate for intermodal port requests (*i.e.*, 25-30%) demonstrates that the burdens and delays associated with the current intermodal porting process are so great that many consumers simply give up before their port requests are completed. The comparatively low rate of cancelled wireless-to-wireless intermodal port requests (*i.e.*, 4%) demonstrates that the higher intermodal cancellation rate is due specifically to the delays and inconveniences

---

8 *See* BellSouth Comments at 2.

9 *See* Sprint Comments at 6. *See also* CTIA Comments at 2 (stating that a "shorter intermodal port interval will help reduce the level of port cancellations").

10 *See* Declaration of Intermodal Port Completion, Michael Witkowski at ¶ 5 (attached hereto as Appendix A) ("Declaration").

11 *Id.*

inherent in the current intermodal porting process. Therefore, the evidence in the record unequivocally demonstrates that there is a need to shorten the intermodal porting interval and improve the intermodal porting procedures in order to make it easier for consumers to retain their number when switching between wireline and wireless carriers.

The Commission has repeatedly determined in several proceedings that fostering intermodal competition serves the public interest.[12] The Commission has also repeatedly concluded that making it easier for consumers to retain their numbers when switching between wireline and wireless carriers facilitates intermodal competition.[13] Therefore, in determining whether adoption of the NANC C2/A3 recommendation and the modifications proposed by T-Mobile, Sprint, Nextel and Syniverse would serve the public interest, the Commission should examine whether obstacles in the current intermodal portability process are frustrating consumer efforts to retain their numbers when switching between wireline and wireless carriers and, if so, whether the proposal would eliminate or minimize those obstacles.

B. The Commission Should Not Consider The Current Ratio Of Intermodal Ports To All Ports When Making Its Public Interest Determination

The claims by certain incumbent local exchange carriers ("ILECs") that consumers do not care about intermodal portability and that consumers would not benefit significantly by improved intermodal porting procedures are unfounded.[14] For example, some ILECs argue that the Commission should not require carriers to incur any additional costs to improve the intermodal porting process because "[e]xtensive consumer demand just does not exist for

---

12 *See, e.g., First Report and Order*, 11 FCC Rcd at 8437, ¶160; *CTIA Petition for Forbearance*, 14 FCC Rcd at 3112, ¶ 40.

13 *See Second Annual Competition Report*, 12 FCC Rcd at 11326.

14 *See, e.g.,* BellSouth Comments at 2-4; Verizon Comments at 3.

intermodal number portability today."[15] These ILECs base their claim that there is no extensive consumer demand on the fact that intermodal port requests currently represent only a "relatively small fraction of all wireline ports."[16]

Contrary to the claims of the ILECs, the relatively small amount of intermodal ports does not demonstrate that consumers do not want intermodal portability or that improvement of the intermodal porting process would not serve the public interest. Indeed, flaws in the intermodal porting process that discourage consumers from seeking intermodal portability (*e.g.*, long porting intervals or frustratingly confusing, difficult and inconvenient porting procedures) would cause intermodal port requests to represent only a "relatively small fraction of all wireline ports," particularly given the fact that consumers enjoy uninterrupted service during the wireline porting interval (the beginning and ending of which is typically undetectable). In T-Mobile's experience, the relatively small amount of intermodal ports actually indicates that the intermodal porting process must be improved so that it is easier and more convenient for consumers to retain their number when switching between wireline and wireless carriers.

In any event, intermodal portability has been available for a little over one year whereas intramodal portability (*e.g.*, wireline portability) has been available for nearly seven years, and thus consumers are far more familiar with the concept of intramodal portability. As such, it is not surprising that the volume of intermodal port requests is comparatively low in the years immediately after its introduction. However, consumer demand for intermodal portability should increase provided that the Commission takes the steps necessary to ensure that it is easy and convenient for consumers to retain their number when switching between wireline and wireless carriers. T-Mobile's experience suggests that consumers want the right to retain their number

---

15 USTA Comments at 2.

16 *Id.*

when switching between wireline and wireless carriers, and that the volume of intermodal port requests will increase steadily over time provided that the intermodal porting process is convenient for consumers.

II. THE PROPOSED RECOMMENDATIONS WOULD SERVE THE PUBLIC INTEREST BY REDUCING THE DELAYS AND INCONVENIENCES ASSOCIATED WITH INTERMODAL PORTABILITY

In order to make intermodal porting as convenient and rapid as possible for consumers, the Commission should identify and eliminate, or at least minimize, any obstacle to reducing the interval between the time a consumer requests an intermodal port and completion of the requested port. The Commission should seek to eliminate or minimize these obstacles in a manner that facilitates future improvements and creates incentives for carriers to process consumer port requests as efficiently as possible.

The record in this proceeding demonstrates that there currently are two main obstacles to reducing the amount of time between the moment a consumer submits a port request and the moment that request is successfully completed. First, the lack of a uniform port request format and the practice of identifying only one error at a time in port requests frequently delays the processing of port requests for days and unnecessarily increases the burden that all carriers incur to process intermodal port requests.[17] As numerous parties noted, the NANC C2/A3 recommendation does not address this obstacle at all, and thus implementation of the recommendation would not eliminate the unnecessary delays and burdens associated with achieving an error-free port request.[18] Second, once the wireline carrier accepts the port request, up to four more business days can pass before the port request is completed under the intervals in

---

17 *See* T-Mobile Comments at 6; Sprint Comments at 6-7.

18 *See, e.g.,* Nextel Comments at 4; Sprint Comments at 4-5; CTIA Comments at 2.

the current default wireline process for intermodal porting. The NANC C2/A3 recommendation is designed to shorten these intervals so that the maximum time permissible to process an error-free port request will be up to 25% shorter, which is a significant reduction.

As explained above, the record evidence in this proceeding paints a vivid picture of the harmful effects that the unnecessary delays and burdens associated with intermodal porting are currently having on intermodal competition and the ability of consumers to retain their numbers while switching between wireline and wireless carriers. T-Mobile agrees with Sprint, Nextel, CTIA and Syniverse that the NANC C2/A3 recommendation provides a good starting point for reducing the maximum permissible time interval for processing error-free intermodal port requests. T-Mobile also agrees that the Commission should require all carriers to use a single, streamlined port request format, which contains only the minimum amount of information necessary to validate and process the consumer's port request. Because implementation of these recommendations would serve the public interest by making it easier for consumers to retain their number while switching between wireline and wireless carriers, as explained in more detail below, T-Mobile respectfully requests that the Commission adopt the following measures:

A. The Commission Should Adopt a Single, Mandatory Port Request Format In Order To Facilitate Rapid Achievement of Error Free Port Requests

The comments reflect widespread agreement that intermodal ports frequently take several days to complete, and that the root cause of much of the unnecessary delay is the difficulty in achieving an error-free port request.[19] T-Mobile agrees with several parties, including CTIA, Nextel, Sprint and Syniverse, that the vast majority of these difficulties could be eliminated by

[19] *See, e.g.,* Comments of BellSouth at 2-4; Sprint Comments at 6 (stating, "the validation process can also lead to substantial delays in the porting process (which frustrates customers) and impose additional and unneeded costs on old and new carriers alike..."); Nextel Comments at 4.

requiring carriers to implement a single streamlined port request rather than continuing to require carriers to exchange carrier-specific "local service requests" ("LSRs" or "LSOGs").[20]

Currently, each wireline carrier's unique LSR, like the one attached at Appendix B, contains over one hundred different data fields,[21] many of which are irrelevant in the wireless context.[22] Moreover, some LECs validate up to 10 different data fields.[23] By contrast, the typical wireless port request, like the one attached at Appendix C,[24] has far fewer data fields, and most wireless carriers now validate only three of those data fields (*i.e.*, account number, Social Security/Tax Identification number, telephone number and – if applicable – any password used to access the customer's old account), which has been a key factor in the ability of the wireless carriers to complete port requests in a matter of hours rather than days.[25] A comparison of a wireline LSR with the typical wireless port request form immediately illustrates why it can be extremely difficult to translate a consumer's port requests into an error-free LSR. The greater the number of data fields, the greater the opportunities for errors that will cause the port to be rejected, which leads to unnecessary delays and costs to correct the errors and resubmit the port request, as Sprint explained in its comments.[26]

The problems caused by the complexity of the use of LSRs or LSOGs are compounded by the fact that LSRs and LSOGs are not uniform, and carriers are free to modify them at will without any prior notice to other carriers. As Sprint explained, larger LECs typically use

---

20 *See, e.g.,* CTIA Comments at 6.

21 *See* Appendix B: Sample Wireline LSR.

22 *See, e.g.,* Nextel Comments at 4 (stating, "wireless providers seeking to port wireline numbers are often required to complete forms that require extensive information – much of which is not relevant in the wireless environment.").

23 *See, e.g.,* Sprint Comments at 8.

24 *See* Appendix C: Sample Wireless Port Request.

25 *See* Nextel Comments at 4-5.

26 Sprint Comments at 8.

industry-developed LSOGs, but there are 10 different versions of LSOG and it appears that at least five different LSOGs are in use today.[27] National carriers like T-Mobile, Sprint and Nextel must therefore be capable of processing numerous different LSOG versions, which unnecessarily increases costs and delay to the intermodal porting process.[28] Further, as T-Mobile explained in its comments, LECs frequently implement changes in their LSOGs up to four times annually without advance notice, which not only increases porting costs and errors, but also frustrates the efforts of all carriers to implement automated number portability systems or use automated systems they have already implemented.[29]

To further complicate matters, many wireline carriers reject LSRs that do not contain an exact match for each and every field in the LSR, even where the port request can be validated and processed without the superfluous information and where the nature of the error is immediately apparent (*e.g.*, listing "Ave." in an LSR rather than "Avenue").[30] As CTIA explained, "[u]nder the current system, each carrier's LSR is different, and includes fields that are not required for number porting. Moreover, wireline carriers routinely reject LSRs that do not include information in every field, which prevents carriers from even starting the clock on the intercarrier porting process. So days and weeks can pass before a port request even gets to the porting process."[31] Moreover, wireline carriers frequently identify only one error when they reject an LSR even if it contains multiple errors.[32] Accordingly, many intermodal port requests are rejected numerous times before they are accepted as error-free.

---

27 Sprint Comments at 9.

28 *Id.*

29 T-Mobile Comments at 5-6.

30 *Id.* at 8.

31 CTIA Comments at 6.

32 T-Mobile Comments at 6.

The comments submitted in this proceeding reflect widespread recognition that the complexity of LSRs and LSOGs are responsible for much of the unnecessary delays that consumers experience today when they attempt to retain their numbers while switching between wireline and wireless carriers.[33] As T-Mobile noted in its initial comments, it typically takes between five and fifteen attempts to obtain an error-free port request.[34] Sprint similarly explained that wireline carriers confirm only 50% of Sprint's port requests on the first attempt.[35]

T-Mobile strongly disagrees with BellSouth's claim that "[i]t is much more important for a carrier to know the business rules of the other carrier involved in the porting transaction than it is to use a common LSOG version."[36] It would be far more efficient and cost effective for all carriers to use the same port request format than to require each carrier to investigate and comply with the business rules of every other carrier in the nation, particularly when the other carriers are free to change those requirements without notice.

The Commission has recognized that only "a minimal amount of identifying information is needed to validate a simple intermodal port request.[37] As Sprint noted in its comments, NANC has similarly observed that "port confirmations and responses would be executed in a short time frame" if the number of validation fields is reduced, and that reducing the number of validation fields would "simplify the port request process" and "significantly reduce the amount of data exchange necessary."[38] NANC concluded that the benefit of such reduction would be "fewer errors and a significantly reduced fall out percentage that could reduce the process costs

---

33 *See* CTIA Comments at 6; Sprint Comments at 9.

34 T-Mobile Comments at 6.

35 Sprint Comments at 6.

36 BellSouth Comments at 12.

37 *Intermodal Porting Order*, 18 FCC Rcd 23697, 23706 n.62 (2003).

38 NANC Report at 15-16; Sprint Comments at 8-9.

associated with simple intermodal port requests."[39] T-Mobile agrees. Streamlining—and unifying—the port request format to require validation of only "a minimal amount of identifying information"[40] (*i.e.*, account number, Social Security/Tax Identification number, telephone number and – if applicable – any password used to access the customer's old account) would reduce (1) the time and effort necessary to process port requests, (2) the costs associated with processing port requests, and (3) the likelihood of porting errors and ports placed in reject status. In addition to these immediate benefits, a single, streamlined port request format would facilitate future improvements to the intermodal porting process. Therefore, T-Mobile agrees with Sprint, Nextel, CTIA and Syniverse that the Commission should adopt a single, mandatory port request format.[41]

The Commission should reject arguments that it would be far too costly to implement a single, streamlined port request format or LSR.[42] Wireless carriers have already implemented a streamlined port request format, and there is no immediately apparent reason why all carriers could not do so on a cost-effective basis. As some parties noted in their initial comments, the ILECs routinely implement changes to their LSOGs,[43] which suggests that the costs associated with implementing a uniform streamlined port request format would not be unreasonable. Moreover, it will be far more cost effective over time for all carriers to process port requests if every carrier is required to use one simple streamlined port request format, which should help to offset the one-time implementation costs of a uniform streamlined port request format. In any

---

39 NANC Report at 16.

40 *Intermodal Porting Order*, 18 FCC Rcd at 23706 n.62.

41 *See* Sprint Comments at 6-7; Comments of CTIA – The Wireless Association at 6 (stating, "the Commission should require the wireless industry to simplify the intercarrier porting process by decreasing the number of data fields carriers need to populate and validate.").

42 *See, e.g.,* BellSouth Comments at 11-13; SBC Comments at 5.

43 CTIA Comments at 6.

event, as explained below, T-Mobile supports the recovery by ILECs of their costs to implement a uniform streamlined port request format. Accordingly, the unsupported allegations of a few carriers about the potential costs to implement a uniform streamlined port request format should not prevent the Commission from adopting a uniform streamlined port request format in light of the substantial benefits to be gained. Indeed, T-Mobile respectfully submits that implementation of a single, mandatory port request format is as important, or even more important, than implementation of the NANC C2/A3 recommendations due to gravity of the problems caused by use of disparate LSRs and LSOGs in the porting process.

B. The Commission Should Adopt The NANC Recommendation For Reducing The Maximum Interval for Processing Error-Free Intermodal Port Requests

Although the comments reflect disagreement about whether a reduction in the intermodal porting interval is necessary, they reflect nearly universal support for the NANC C2/A3 recommendation as the best way to reduce the intermodal porting interval.[44] This support is not surprising since the interests of carriers serving the majority of consumers in the United States are either directly or indirectly represented in the NANC, which developed the Report and recommendation on a consensus basis. Accordingly, to the extent the Commission concludes that the public interest would be served by reducing the length of the intermodal porting interval in order to make it easier for consumers to retain their number when switching between wireline and wireless carriers, the NANC C2/A3 recommendation is the best means at this time for reducing the maximum intervals in which carriers must process error-free port requests. As explained above, the public interest clearly would be served by reducing the length of the

---

[44] *See* SBC Comments at 3-4; BellSouth Comments at 5.

intermodal porting interval, and thus the FCC should implement the NANC C2/A3 recommendation

There is no merit to the unsupported claim that the NANC C2/A3 recommendation will not result in a materially significant reduction in the length of the intermodal porting interval.[45] In combination with the modifications proposed by T-Mobile, Sprint, Nextel, CTIA and Syniverse, implementation of the NANC C2/A3 recommendation would significantly reduce the length of time from the moment a consumer submits an intermodal port request to the moment at which that request is completed. As explained in the NANC Report, the NANC C2/A3 recommendation would reduce the maximum porting interval from 96 to 53 hours.[46] Depending upon the timing of the port request, the NANC C2/A3 recommendation alone would shorten the wait by two days, which represents a significant reduction. Even a one-day savings represents a 25% improvement over the maximum interval in which carriers must process error-free port requests, which will reduce the number of port cancellations and likely lead to more intermodal port requests.

Adoption of the NANC C2/A3 recommendation also represents a substantial improvement over the current porting process because it would require all carriers to abide by specific deadlines for implementing the port request. Under the current wireline guidelines, the "porting interval for wireline [carriers] include[s] a maximum of one (1) day for the LSR/FOC process and three (3) days for the porting process."[47] Carriers have interpreted this provision to mean a maximum of one day for the LSR/FOC process, but a *minimum* of three days of the

---

45 *See, e.g.,* Frontier/Citizens Comments at 1-6; *see also* Verizon Comments at 2 (stating that there is not any "evidence that consumers would materially benefit from any shortening of the current 96-hour intermodal porting interval.").

46 *See* NANC Report at 4, 30.

47 LNPAWG, Second Report on Wireless Wireline Integration, § 3.3 (Feb. 5, 1999).

porting process. In other words, the three-day goal for the porting process is an open-ended requirement with no consequences for failure to meet that interval. The Commission could benefit consumers, and thus serve the public interest, by establishing a firm deadline for the completion of intermodal port requests so that carriers no longer claim the procedures provide for a minimum of three days to complete these ports.

Claims that implementation of the NANC C2/A3 recommendation would impose exorbitant costs to implement do not appear to be credible.[48] Indeed, NANC fully addressed the issue of costs and estimated that the C2/A3 recommendation can be implemented for a one-time total cost of less than $50 million, which is very low considering the total customer base over which this cost will be spread.[49] As CTIA noted in its comments, when the Commission ordered the implementation of wireless portability, the agency concluded that the recurring annual costs of $50 million which Cingular estimated it would incur were not significant since they could be spread across Cingular's base of 30 million subscribers.[50] With respect to the NANC C2/A3 recommendation, the estimated one-time implementation cost of $50 million will be spread over a base of customers that is many times greater than 30 million subscribers, which suggests that the costs per subscriber will be much less than the Commission has imposed with past portability measures.

The most important aspect of the NANC C2/A3 recommendation is the requirement that carriers use a mechanized interface to exchange port requests (*i.e.*, an automated way to

---

48 *See, e.g.,* Comments of Frontier/Citizens at 7 (claiming that implementation of the NANC C2/A3 Recommendation would impose $1.4 million of one-time costs and more than $450,000 in annual recurring costs, which is claimed to represent $1,300 per intermodal port request). *Cf.* Comments of the Office of Advocacy, U.S. Small Business Administration at 4 (estimating that "hardware, software and transition costs can add up to $100,000").

49 NANC Report at 21.

50 *See* CTIA Comments at 5.

exchange port requests rather than exchanging port requests via facsimile), which T-Mobile submits should be standardized and uniform.[51] T-Mobile respectfully submits that the use of a single, streamlined port request format would significantly reduce the one-time costs that carriers would incur to implement the NANC C2/A3 recommendation, and that these costs would not be nearly as significant as some carriers claim. However, as explained below, T-Mobile supports both (1) the recovery by ILECs of their costs to implement the C2/A3 recommendation and (2) the grant of individual waivers on a case-by-case basis for carriers that would have to impose an unreasonably high line-item surcharge to recover those implementation costs. Therefore, unproven allegations with respect to the potential costs a few carriers claim they will incur to implement the NANC C2/A3 recommendation should not prevent the Commission from ordering the implementation of the recommendation, particularly since NANC has concluded that the one-time implementation costs will be relatively low.

III. REDUCING THE INTERMODAL PORTING INTERVAL AND IMPROVING THE PORTING PROCESS WILL NOT CAUSE MORE INADVERTENT PORTS

There is widespread agreement among carriers from every industry sector that reducing the porting interval will not increase the number of inadvertent ports.[52] No party has put forth any data demonstrating, or even suggesting, that a reduced porting interval would lead to more inadvertent ports, instead making only general assertions that a reduced porting interval might be

---

51 *See* NANC Report at 28.

52 BellSouth Comments at 13 ("Shortening the porting interval as recommended by the NANC will not significantly increase or decrease the number of inadvertent ports. In fact, there should be little, if any, impact on inadvertent ports."); SBC Comments at 6 ("a reduced porting interval will merely result in quicker inadvertent ports rather than more inadvertent ports."); Sprint Comments at 9.

have a negative impact on inadvertent ports.[53] To the contrary, reducing the porting interval and requiring fewer validation fields, in fact, may reduce the number of inadvertent ports. To this end, T-Mobile agrees with Sprint's and the NANC Report's conclusion that "[r]educing the number of validation fields would 'simplify the port request process,' which would result in 'fewer errors and a significantly reduced fall out percentage...."[54]

Data demonstrate that a reduced porting interval and fewer data fields would result in fewer inadvertent ports. As stated above, wireless carriers currently use a much shorter porting interval in comparison with wireline carriers. Use of this shortened interval and the reduced number of validation fields actually has resulted in fewer inadvertent ports. In T-Mobile's experience, on average, the percentage of inadvertent wireless ports is substantially less than the percentage of intermodal ports.[55] On average, approximately 1.57% of the intermodal ports were inadvertent ports whereas only 0.051% of the wireless ports were inadverent ports.[56] Although neither percentage indicates a substantial problem with inadvertent ports, it is notable that the percentage of inadvertent intermodal ports is substantially greater (over thirty times greater) than the percentage of inadvertent wireless ports. This demonstrates that neither a shorter porting interval nor a reduced amount of validation information will result in an increased amount of inadvertent ports.

Furthermore, there is no merit to SBC's claim that the Commission should require a letter of agency ("LOA") prior to porting a telephone number. The limited information that wireless carriers currently use to validate port requests has been more than sufficient to ensure that

---

53 *See* USTA Comments at 5 (stating that the "Commission should be most concerned with whether numbers are correctly ported to the customer.").

54 Sprint Comments at 9 (quoting NANC Report at 15-16).

55 *See* Declaration ¶ 7.

56 *Id.*

inadvertent ports are not accepted and activated. As such, no further measures are necessary to prevent inadvertent ports. Moreover, requiring wireless carriers to submit an LOA as proof of verification for the port request would be akin to allowing the porting-out carrier – the carrier losing the customer – to verify the carrier change, giving the losing carrier an opportunity to delay and winback the customer. In the landline context, the Commission repeatedly has rejected executing carrier attempts to verify carrier change requests expressing concern about anticompetitive activities of the executing carrier.[57] The Commission similarly must reject any and all wireline carrier attempts to institute additional verification steps into the porting process; these additional steps are unnecessary and anticompetitive.

IV. ILECS SHOULD BE PERMITTED TO RECOVER LEGITIMATE COSTS INCURRED TO SHORTEN THE INTERMODAL PORTING INTERVAL AND IMPROVE THE PORTING PROCESS

T-Mobile supports the comments filed in this proceeding arguing that carriers should be able to recover the legitimate costs of implementing NANC's C2/A3 recommendation as well as the modifications recommended by T-Mobile, Sprint, Nextel and Syniverse.[58] As various ILECs observed in their initial comments, the costs incurred to implement NANC's recommendation would constitute legitimate LNP costs for which carriers should be entitled to recover.[59] Accordingly, all carriers should be entitled to recover these costs pursuant to the Act and the Commission's rules.

---

57 *See Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996, Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers,* Third Order on Reconsideration and Second Further Notice of Proposed Rulemaking, 18 FCC Rcd 5099, 5101-02, ¶¶ 6-7(2003); *see also* 47 C.F.R. § 64.1120(a)(2) (prohibiting an executing carrier from verifying the submission of a change in a subscriber's selection of telecommunications service received from a submitting carrier).

58 *See* BellSouth Comments at 7; USTA Comments at 7.

59 *See* Verizon Comments at 4 (stating, "carriers may recover their LNP costs, provided that such costs would not have been incurred 'but for' the implementation of LNP…").

Consistent with section 251(e)(2) of the Act, the Commission requires "all telecommunications carriers to bear in a competitively neutral manner the costs of providing long-term number portability."[60] The Commission's rules and orders specifically define and limit the ILECs' ability to recover LNP costs. By contrast, non-ILEC carriers are permitted to recover their LNP costs "in any lawful manner consistent with the obligations under the Communications Act."[61] Therefore, T-Mobile agrees with the parties who urge the Commission to enter a blanket waiver of its five-year LNP cost recovery rule so that ILECs have the opportunity to recover legitimate LNP costs associated with reducing the intermodal porting interval and improving the intermodal porting process.[62]

V. THE COMMISSION SHOULD GRANT WAIVERS OF ANY NEW REQUIREMENTS ON A CASE-BY-CASE BASIS AS APPROPRIATE

T-Mobile supports granting individual waivers – rather than a blanket exemption – of the Commission's rules requiring carriers to shorten the porting interval to carriers that meet the waiver standard on a case-by-case basis. The recommendations made in the NANC Report and the improvements recommended herein are technically feasible for all carriers that have implemented LNP. As discussed above, T-Mobile supports full cost recovery for the all carriers, including ILECs, for the legitimate costs that they incur to implement NANC's proposed reduced porting interval. Therefore, the only situation in which a waiver could be appropriate is where the costs that the carrier would incur spread across its entire customer base would result in an unreasonably high line item LNP surcharge.

---

60 *Telephone Number Portability*, Third Report and Order, 13 FCC Rcd at 11706, ¶ 8.

61 *Id.* at 11774, ¶ 136.

62 *See, e.g.*, Sprint Comments at 11-14.

The amount of the LNP surcharge is determined both by the costs an individual carrier incurs and the size of the customer base over which the carrier can spread those costs. Since both of those variables are carrier-specific, T-Mobile opposes comments arguing that the Commission should grant a blanket waiver of implementing the NANC recommendation to all small and/or rural carriers.[63] Instead, the Commission must evaluate each carrier's costs and its ability to recover those costs based on the size of its customer base. In addition, T-Mobile disagrees with NTCA's characterization that NANC supported a blanket waiver of the implementation of a reduced porting for rural carriers.[64] The NANC Report did not endorse a blanket waiver for all rural carriers. Instead, consistent with the approach that T-Mobile recommends herein, NANC acknowledged that reducing the porting interval "may cause economic impacts on rural telephone companies" and recommended that the affected companies "may seek a waiver from LNP and/or shorter porting intervals under the existing rules and regulations."[65]

If a carrier believes that recovery of the legitimate costs that it has incurred to implement the proposed improvements would lead to an unreasonably high line item charge, then the carrier can request an individual waiver from the Commission. Consistent with the Commission's waiver standard, the carrier should demonstrate that there are special circumstances that warrant a departure from the existing rules.[66] Not all carriers will need a waiver of the Commission's

---

63 *See* Comments of the National Telecommunications Cooperative Association at 5 (stating that small rural companies should be exempt from implementing NANC's recommendation); *see also* Comments of Advantage Cellular Systems, Inc. at 3.

64 *See* Comments of the National Telecommunications Cooperative Association at 1, 3 (stating, "NTCA agrees with the NANC Report conclusions that the additional cost to rural carriers and their customers to implement the necessary changes to decrease the porting interval would be too burdensome.").

65 NANC Report at 25.

66 47 C.F.R. § 1.3; *see WAIT Radio v. FCC*, 418 F.2d 1153, 1158 (D.C. Cir. 1969).

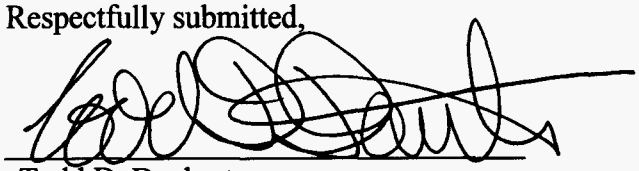
requirement that carriers implement a reduced porting interval. As demonstrated herein, reducing the porting interval is beneficial to end user consumers, who frequently cancel port requests that are delayed. Consumers served by small and rural carriers should be able to have the same shortened porting interval as consumers served by larger carriers or consumers in more urban areas. Therefore, the Commission should not establish a blanket waiver to the detriment of end user customers when some carriers simply will not need the relief.

The Commission only should entertain waivers of the requirement that carriers institute a reduced porting interval; the Commission should not grant a waiver of the requirement that carriers implement a uniform port request format. As discussed above, implementation of a uniform port request format in and of itself should reduce intermodal porting delays, and consumers will benefit substantially from its implementation. Implementing a uniform port request format, particularly for carriers that already have implemented LNP, should not be cost prohibitive. Furthermore, the implementation of the uniform port format will make number portability seamless for all customers, in part because all carriers are using the same port format. If the Commission grants individual waivers of the uniform port request format, then it destroys the benefit of having the uniform port request in the first instance. Consumers should not be denied the benefits of intermodal porting that inevitably will be achieved through the implementation of a uniform port request format.

VI. CONCLUSION

For the foregoing reasons, T-Mobile respectfully requests that the Commission grant the relief requested herein.

Respectfully submitted,



Thomas J. Sugrue, Vice President
Government Affairs
Anna Miller, Director
Numbering Policy
T-MOBILE USA, INC.
401 9th Street N.W. Suite 550
Washington, D.C. 20004

Todd D. Daubert
Jennifer M. Kashatus
KELLEY DRYE & WARREN LLP
1200 19th Street, N.W.
Washington, DC 20036
(202) 955-9600 (telephone)
(202) 955-9792 (facsimile)
tdaubert@kelleydrye.com

Counsel to T-Mobile USA, Inc.

December 17, 2004

APPENDIX A

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
Telephone Number Portability	)	CC Docket No. 95-116

DECLARATION OF Intermodal Port Completion

1. My name is **Michael Witkowski**. I am over 21 years of age, and I am competent to testify to the matters set forth in this Declaration. I have personal knowledge of the facts stated herein, and they are true and correct.

2. My business address is **12920 SE 38th ST, Bellevue, WA 98006**. I am currently employed by T-Mobile USA, Inc. ("T-Mobile") as a **Senior Manger of Billing Operations**. In this capacity I am responsible for **supporting multiple information technologies, including Wireless Number Portability**. As such, I am familiar with the procedures for processing intermodal and wireless ports, the intervals for accomplishing such ports, and customer cancellations of such ports.

3. The primary purpose of my declaration is to discuss the length of time that it takes to complete an intermodal port, and the causes for unnecessary delay in the porting process. In doing so, I also will address the high rate of intermodal port request cancellations.

4. I have reviewed data regarding the submission of port requests and the length of time that it takes for the port requests to be processed. There is a significant disparity between the length of time it takes to process wireless and intermodal port request, as well as the unnecessary burdens associated with processing intermodal port requests. In T-Mobile's experience, on average, it takes between eight to ten days to complete the majority of intermodal

ports, with some port requests being processed in fewer than eight days and other port requests taking greater than ten days. By comparison, it only takes on average less than one day to complete a wireless-wireless port request.

5. In T-Mobile's experience, a greater percentage of customers cancel their intermodal port requests as compared with their wireless-wireless port requests. Specifically, on average, approximately 25% of customers who submit intermodal port requests cancel their request before the port is completed. By contrast, approximately 4% of customers who submit wireless port requests cancel their request before the port is completed.

6. The porting process for intermodal ports is more complex than for wireless ports. To request an intermodal port, the wireless carrier must submit a Local Service Request ("LSR") to the local exchange carrier. Each local exchange carrier uses a slightly different LSR format and has different requirements. The typical LSR contains over one hundred fields that the wireless carrier must complete before the wireline carrier will process the port request. By contrast, most wireless carriers use the same wireless port request format. The typical wireless port request form contains approximately fourteen different fields, and most carriers validate the port request on just three fields, including telephone number, account number or social security number, and, where appropriate, security code.

7. In my experience, a smaller percentage of wireless ports are inadvertent despite the fact that wireless carriers validate fewer data fields, and wireless carriers resolve inadvertent ports far more quickly than wireline carriers. On average, approximately 1.57% of the intermodal ports were inadvertent ports. By comparison, on average approximately 0.05% of the wireless ports were inadvertent ports.

This concludes my declaration. I verify under penalty of perjury that the information in the attached letter is true and correct.

Michael Witkowski

December 17, 2004

APPENDIX B

Local Service Request

v6

Administrative Section

CCNA 1	PON 2	VER 3	LSR NO 4	LOCQTY 5	HTQTY 6

AN 7	ATN 8	SC 9	SC1 10	SC2 11	PG _ of _ 12	RESID 13

D/TSENT 14	DSPTCH 15	DDD 16	APPTIME 17	DDD0 18

NOR 19	APPTIME 20	DFDT 21	PROJECT 22	LSCP 23	CHC 24	REQTYP 25	P 26	SLI 27	ACT 28	MI 29	SUP 30	EXP 31	AFO 32	MEU 33

RTR 34	CC 35	NNSP 36	ONSP 37	AENG 38	ALBR 39	SCA 40	AGAUTH 41	DATED 42	AUTHNM 43	PORTTYP 44	ACTL 45

SACTL 46	AI 47	APOT 48	LST 49	LSO 50	TOS 51	SPEC 52	NC 53	PBT 54

NCI 55	CHANNEL 56	SECNCI 57	RPON 58	RORD 59	LSP AUTH 60

LSP AUTH DATE 61	LSP AUTH NAME 62	LSPAN 63	CIC 64	CUST 65	NPDI 66

Bill Section

BI1 67	BAN1 68	BI2 69	BAN2 70	ACNA 71	EBD 72	CNO 73	NRI 74

BILLNM 75	SBILLNM 76	TE 77	EBP 78

STREET 79	FLOOR 80	ROOM/MAIL STOP 81	CITY 82

STATE 83	ZIP 84	BILLCON 85	BSPRAO 86	TEL NO 87	VTA 88

Contact Section

INIT 89	TEL NO 90

EMAIL 91	FAX NO 92

STREET 93	FLOOR 94	ROOM/MAIL STOP 95	CITY 96

STATE 97	ZIP 98	IMPCON 99	TEL NO 100	PAGER 101

ALT IMPCON 102	TEL NO 103	PAGER 104

DSGCON 105	DRC 106	TEL NO 107	FAX NO 108

EMAIL 109

STREET 110	FLOOR 111	ROOM/MAIL STOP 112	CITY 113

STATE 114	ZIP 115

REMARKS

116

3/15/2002

Approved for External Distribution

APPENDIX C

▲ Wireless Port Request (WPR)

27431 Page 1 Of ▲

☐ **Initial Request**
OR
Supplement Type
☐ Cancel Request
☐ New Due Date and Time
☐ Other (Remarks Required)

Request Number

Version ID

Response Number

Marking Instructions
- Use Blue or Black Pen only
- Please stay inside the boxes
- Print one character per box
- Use UPPER CASE letters

A B C D E F G 1 2 3 4 5 6 7 Correct ■

Number Portability Direction Indicator
☐ Wireless to Wireless
☐ Wireless to Wireline
☐ Wireline to Wireless

Time Zone (mark one)

☐ AST	☐ MDT
☐ EST	☐ PST
☐ EDT	☐ PDT
☐ CST	☐ AKST
☐ CDT	☐ AKDT
☐ MST	☐ HST

Social Security Number/Tax ID

Password/PIN

Account Number

Old Network Service Provider

New Local Service Provider

New Network Service Provider

New Reseller Name

Date Sent (Month – Day – Year)

Time Sent (Hours : Minutes) ☐ AM ☐ PM

Desired Due Date (Month – Day – Year)

Desired Due Time (Hours : Minutes) ☐ AM ☐ PM

Coord. Hot Cut

Agency Auth. Status

Date of Agency Authorization (Month – Day – Year)

Authorization Name

Group Request Number

Initiator Identification (Creator)

Implementation Contact

Telephone Number for Implementation Contact

▲ *Wireless Port Request (WPR)*

38841

Bill Name (Responsible Party)

Prefix | First Name | MI

Last Name | Suffix

Business Name

Marking Instructions

- Use Blue or Black Pen only
- Please stay inside the boxes
- Print one character per box
- Use UPPER CASE letters

A B C D E F G 1 2 3 4 5 6 7 Correct ■

Street Address

Street Number | Street Name | Street Directional | Country

City | State/ Province | Zip Code

Remarks

For Single-line, Single-range, & Multi-line requests, fill in the fields below. Use the Multi-line Number Portability Request Form (for [illegible]

Number Portability Quantity | Line Number | End Subscriber

Ported Telephone Number